IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Timothy Louis ONeill : Chapter 13

Debtor : No.: 19-16451-jkf

CERTIFICATE OF NO RESPONSE

The undersigned does hereby certify:

- 1. That I am the attorney for Timothy Louis ONeill, Debtor in the above-captioned matter.
- 2. That a copy of the motion to avoid the judicial lien of Cavalry SPV I LLC at docket no. 2018-23936, along with notice of motion filed with this Court on May 7, 2020 was served upon parties in interest on May 7, 2020.
- 3. A Certificate of Service was filed with this Court on May 7, 2020 declaring service to the parties in interest.
- 4. A response deadline was set for May 27, 2020.
- 5. No response to said Motion has been received as of June 3, 2020.

Respectfully Submitted,

ROSS, QUINN & PLOPPERT, P.C

BY: /s/ Joseph Quinn

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Date: June 3, 2020 JQuinn